

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Bankruptcy No. 22-10473-mdc
GARY CORNELL,	Chapter 13
Debtors	Doc. No. 22
FIFTH THIRD BANK, N.A.,	Hearing Date: 7/19/2022
Respondent	Time: 10:30 a.m.
v.	Location: Courtroom #2, Nixon Building
GARY CORNELL, and KENNETH E. WEST, Chapter 13 Trustee Respondents	

**RESPONSE TO DEBTOR'S MOTION TO DETERMINE VALUATION OF SECURED  
DEBT OF CREDITOR FIFTH THIRD BANK, N.A.**

Respondent, Fifth Third Bank, N.A. (hereafter "Fifth Third"), by and through its undersigned counsel, Bernstein-Burkley, P.C., hereby files this *Response to Debtor's Motion to Determine Valuation of Secured Debt of Creditor Fifth Third Bank, N.A.*:

1. Admitted.
2. Admitted.
3. Denied. By the way of further response, at the date of the petition, Fifth Third shows a valuation of \$45,300.00 per NADA.
4. Admitted.
5. Denied as stated. By the way of further response, although it was purchased outside the 910 days from bankruptcy filing, the amount proposed to be paid for the proper valuation is underestimated. The proper value per NADA is \$45,300.00.

WHEREFORE, Fifth Third respectfully requests that the court enter an Order denying the Debtor's Motion to Determine Valuation of Secured Debt of Creditor Fifth Third Bank, N.A. with prejudice and allow its claim to govern.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck  
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Dated: July 15, 2022